

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA	:	
	:	
V.	:	Case No. 19-159-ELH
	:	
XAVIER LEE	:	
	:	
Defendant	:	

**MOTION FOR PRETRIAL RELEASE TO ATTEND DEFENDANT'S
MOTHER'S FUNERAL**

COMES NOW the Defendant by and through his attorney, Michael E. Lawlor, and respectfully requests that this Honorable Court modify the conditions of release and permit the Defendant to attend his mother's funeral for eight hours this Saturday, August 14, 2021. In support of this motion, counsel states as follows:

1. Mr. Lee pled guilty earlier this year to Child Sex Trafficking and is pending sentencing. He is currently incarcerated, pending sentencing, at the Correctional Treatment Facility in Washington, DC.

2. On or about, August 5, 2021, Ms. Debra Matthews, the Defendant's mother, passed away.

3. Ms. Matthew's funeral is currently scheduled for this Saturday, August 14, 2021. The funeral will be held at noon. at the R.T. Foard Funeral Home, 122 W. Main Street, Newark, DE 19711.

4. Undersigned counsel confirmed the funeral arrangements above.

5. Undersigned counsel also contacted United States Pretrial Service Office. Mr. John Stagg responded that the Office defers to the Court. Ayn Ducao, Assistant United States Attorney, takes no position on this request.

Wherefore, the Defendant prays that this Honorable Court grant the request made in the instant motion, and permit the defendant pretrial release for the afternoon of Saturday, August 14, 2021, so that he may attend the funeral of, and give his final farewell to, his deceased mother. The Defendant also respectfully requests an immediate hearing on this request.

Respectfully submitted,

s/_____
Michael E. Lawlor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 11, 2021, a copy of the foregoing motion was sent to the United States Attorney's Office for the District of Maryland, via ECF.

s/_____
Michael E. Lawlor